

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION III**

## 841 Chestnut Building Philadelphia, Pennsylvania 19107

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Robert T. Noonan The National Passenger Corporation (AMTRAK) Wilmington Maintenance Facility 400 N. Capital Street, N.W. Washington, DC 20001

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202-383-25 99

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Region III of the United States Environmental Protection Agency (EPA) has conducted a review of our Resource Conservation and Recovery Act (RCRA) and National Pollutant Discharge Elimination System (NPDES) files for your facility located in the State of Delaware. As a result of this review, EPA has concluded that some additional information is required to determine the status of this facility as a generator, treater, storer, or disposer of hazardous waste.

Therefore, EPA requests, pursuant to Section 3007(a) of RCRA, 42 U.S.C. § 6927(a), that you furnish, within fifteen (15) calendar days of receipt of this letter, the following information:

- 1. A detailed description of all hazardous waste storage, treatment and disposal facilities and activities, including location, type of activity, and quantity and type of waste, at the facility.
- 2. A detailed sampling analysis of sludge and liquids contained in all NPDES/RCRA impoundments located at the facility.

Please note that failure to submit the information requested without adequate justification is a violation of Section 3007(a) of RCRA and may result in enforcement action. Violations of RCRA may result in civil penalties of up to \$ 25,000 per day, and/or criminal penalties of up to \$50,000 per day or two years imprisonment, or both for each violation. (See 42 U.S.C. §§ 6928(c), (d) and (g)).

Please send the requested information to:

Ms. Traci Self (3HW15) U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, PA 19107

This collection of information request is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

If you have any questions concerning this matter, please contact Ms. Self at (215) 597-2381.

Sincerely,

Bruce P. Smith, Chief

Hazardous Waste Enforcement Branch

cc: Phil Retallick (DE DNREC)

TIME 2 1 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert T. Noonan
The National Passenger Corporation (AMTRAK)
Wilmington Maintenance Facility
400 N. Capital Street, N.W.
Washington, DC 20001

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Please send the requested information to:

Ms. Traci Self (3HW15)
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

CONCURRENCES											
SYMBOL	3HW15	3HW15	3RC22	3HW10	3HW10						
SURNAME	SELF	THOMAS	EARLY	SCHAUL	SMITH						
DATE											

EPA Form 1320-1 (12-70)

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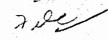
Sincerely,

Bruce P. Smith, Chief Hazardous Waste Enforcement Branch

cc: Phil Retallick (DE DNREC)

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No Status Date /\_/\_

10. Comments: 5262.34 - Accumulation > 90 days





January 13, 1983

Environmental Protection Agency Region III Post Office Box 1480 Philadelphia, PA 19107

Dear Sir,

Enclosed please find a copy of the 1981 Hazardous Waste Report for our facilities in Wilmington, Delaware, Philadelphia, Pennsylvania and Paoli, Pennsylvania.

In the future, I would appreciate your sending the necessary paperwork to me at:

400 North Capitol Street, N.W. Washington, DC 20001

Doing so would expedite this entire reporting procedure.

Thank you for your cooperation.

Very truly yours,

Robert T. Noonan

Robert T. Noonan

Senior Director - Environmental
and Pollution Control Engineering

1/26/83 Mr Mornan wishes to have the will madenge sease changed to above & also he will be the restart.

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EPA Form 8700-13 (1-81)

Robert T. Noonan

PAGE 1\_\_\_\_ OF \_\_\_\_2\_\_

DATE SIGNED

GSA No. 12345-XX Form Approved OMB No. 158 ROOXX **d**4 4 30

Please print or type with ELITE type (12 characters finch). **SEPA** GENERATOR ANNUAL REPORT - PART A FOR OFFICIAL USE ONLY (Items I and 2) XIII, FACILITY ADDRESS (street or P.O. box, city, state, & zip code XI. FACILITY'S EPA I.D. NO. 84th Darby Township Pennsylvania Graves Resources Management XIV. WASTE IDENTIFICATION Waste fuel oil, contaminated PCB's DO . O. Q Waste fuel oil, contaminated PCB's Solid waste, rags, etc. cont. PCB's 1 14 84 Spent halogenated solvent TCE 3 82 8 Spent halogenated solvent TCE 10 RECEIVED RCRA PERMITS & PESTICISES SECT

> Page 1 of 3 Doc. No. 40-08/81/12/5

Page 2 of 3 Doc. No. 40-08/81/12/5

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Doc. No. 40-08/81/12/5





February 11, 1981

Environmental Protection Agency Region III P.O. Box 1480 Philadelphia, PA 19107

Dear Sir:

Attached is a copy of the subsequent Notification of Hazardous Waste Activity for our facility(s) in your region. This notification supersedes that submitted to you in our August 15, 1980 report. Please note the addition under IX-E-Characteristics of non-listed hazardous waste. In rare circumstances, we may have the need to dispose of small amounts of locomotive cooling water solution containing 2,000 to 3,000 ppm of hexavalent chromium. Each locomotive holds approximately 320 gallons of potassium dichromate treated cooling water and, in most cases, it is re-used and not discharged.

We do, however, wish to be on record as possible generators of chromate containing wastes and therefore submit this revised notification.

Please direct any questions and all future correspondence to me at the above address.

Very truly yours,

Health for R.F. Lawson

Robert F. Lawson Vice President/Chief Engineer

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EPA Form 8700-12 (6-80)

**CONTINUE ON REVERSE** 

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IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)	14 15
A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.	
B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four—digit number from 40 CFR Part 261.32 for each listed hazardous waste specific industrial sources your installation handles. Use additional sheets if necessary.	irom
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C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four—digit number from 40 CFR Part 261.33 for each chemical sul stance your installation handles which may be a hazardous waste. Use additional sheets if necessary.	<b>b</b> -
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D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, vetering hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.	nary
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 – 261.24.)  1. IGNITABLE  1. IGNITABLE  1. IGNO2)  1. IGNO2)  1. IGNO3)	7
X. CERTIFICATION	
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the informatio I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for su mitting false information, including the possibility of fine and imprisonment.	on.
SIGNATURE  MAME & OFFICIAL TITLE (type or print)  R. F. LAWSON  VICE PRESIDENT AND  CHIEF ENGINEER	

EPA Form 8700-12 (6-80) REVERSE



August 15, 1980

EPA Region III P. O. Box 1480 Philadelphia, PA 19107

Dear Sir:

Enclosed are the notifications of hazardous waste activity for our facilities in your region. The following specific items must be addressed at these sites:

1. Our facility in Wilmington, Delaware, utilizes underflow dams on the Brandywine Creek, a floating oil skimmer, and three oil skimmings holding tanks to contain any possible oil spill at this facility. Oil is occasionally picked up from behind these dams, but we do not remove sludge from behind them.

Based on our knowledge of the waste water entering the system of dams, we do not feel that it can be classified as a hazardous waste. However, the collected oil may possibly be classified as a hazardous waste. Amtrak will conduct lab tests to determine whether the oil constitutes a hazardous waste. If the oil is found to be a hazardous waste, we feel that this facility should be classified as a hazardous waste generator. We do not feel that these underflow dams qualify as surface impoundments.

This facility also conducts vapor degreasing activities which utilize trichloro and/or perchloro ethylene. The waste solvents and sludge from these operations would be classified as hazardous waste under your regulations. The sludge and spent solvents are disposed of via licensed contractors, with no on site storage in excess of 90 days.

The Wilmington shops have some stationary transformers that contain PCB or PCB-contaminated dielectric fluids. In addition, Amtrak services electric motive power (Amtrak, Conrail, NJ DOT and SEPTA owned) which have PCB filled transformers. Spills from these units could generate hazardous waste which would be disposed of via a licensed contractor. Amtrak no longer adds PCBs to any transformer and is working to find a suitable substitute for this material. Currently, any liquid PCBs collected by Amtrak are being removed from our property by Safety Engineered Disposal, Inc. of P.O. Box 1306, Waukesha, Wisconsin, 53187. The liquid PCBs are being shipped under Wisconsin Transportation Lic. No. 0952 to a storage facility at 925 East First Street, Dayton, Ohio 45402.

To the best of our knowledge, this facility does not handle any other solid waste which can be classified as hazardous.

2. 30th Street Coach Yard - Philadelphia, PA, utilizes a gale oil separator and a waste oil tank.

Based on our knowledge of the waste water entering the oil separator, we do not feel that it can be classified as a hazardous waste. However, the collected oil and sludge may be possibly classified as a hazardous waste. Amtrak will conduct lab tests to determine whether either of these materials constitute a hazardous waste. If the oil or sludge are found to be hazardous, we feel that this facility should be classified as a hazardous waste generator.

To the best of our knowledge, this facility does not handle any other solid waste which can be classified as hazardous.

3. It should be noted that the Amtrak car shop at Paoli, while owned by Amtrak, is operated by Conrail to service Southeastern Pennsylvania Transportation Authority equipment. In servicing this equipment, Conrail utilizes Polychlorinated Biphenyl-based dielectric material. This facility should therefore be classified as a hazardous waste generator.

If the Environmental Protection Agency has a different opinion regarding the classification of any of our facilities, please so inform us as soon as possible and send the necessary permit forms.

Please direct all future correspondence regarding any Amtrak facility in your region to me at the above address.

Very truly yours,

R. F. Lawson

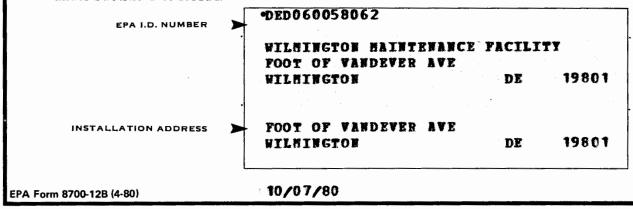
Vice President/Chief Engineer

Enclosures



## ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



NAME OF IN-										
I. STALLATION complete and correct, leave Items I, II, and below blank. If you did not receive a preprint										
INSTALLA-	ins a									
11. MAILING PLEASE PLACE LABEL IN THIS SPACE treated, stored and/or disposed of, or a tr	rans-									
porter's principal place of business. Please r to the INSTRUCTIONS FOR FILING NOT										
CATION before completing this form. information requested herein is required by										
III OF INSTAL:										
Recovery Act.										
FOR OFFICIAL USE ONLY										
COMMENTS										
C										
INSTALLATION'S EPA I.D. NUMBER APPROVED (yr., mo., & day)										
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I. NAME OF INSTALLATION										
WILMINGTON MAINTENANCE FACILITY										
II. INSTALLATION MAILING ADDRESS										
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III. LOCATION OF INSTALLATION										
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IV. INSTALLATION CONTACT										
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V. OWNERSHIP										
A. NAME OF INSTALLATION'S LEGAL OWNER										
8 NATIONAL RAILROAD PASSENGER CORPORATION										
(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es/										
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M = NON-FEDERAL C. TREAT/STORE/DISPOSE D. UNDERGROUND INJECTION										
VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es)										
A. AIR B. RAIL C. HIGHWAY A D. WATER E. OTHER (specify):										
VIII. FIRST OR SUBSEQUENT NOTIFICATION										
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.										
C. INSTALLATION'S EPA I.D. N	10.									
A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)										
IX. DESCRIPTION OF HAZARDOUS WASTES  Please go to the reverse of this form and provide the requested information.										

IX. DESCRIPTION OF HAZ	ZARDOUS WASTES (co	ntinued from fr	ront/		
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X. CERTIFICATION					<u> </u>
I certify under penalty of attached documents, and if I believe that the submitte mitting false information, if	hat based on my inquiry d information is true, ac	y of those indiscurate, and con	viduals immediately mplete. I am aware	responsible for obta	ining the information,
SIGNATURE		NAME & OFFI	CIAL TITLE (type or p	rint)	DATE SIGNED
			R. F. LAWSON		100
(FJ Jan		VP	CHIEF ENGINE	ER	8/15/80

EPA Form 8700-12 (6-80) REVERSE